

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

THOMAS L. TAYLOR, III, solely in his capacity as Court-appointed temporary Receiver for Breitling Energy Corporation, *et al.*

Plaintiff,

CIVIL ACTION NO. 3:19-cv-02602-D

SCHEEF & STONE, LLP, ROGER
CRABB, and MITCH LITTLE,

Defendants.

STIPULATION OF PARTIES REGARDING THE DEADLINES FOR
DEFENDANTS' MOTION TO DISMISS

Plaintiff Thomas L. Taylor, III, solely in his capacity as Court-appointed temporary Receiver for Breitling Energy Corporation, *et al.* (“Plaintiff”) and Defendants Scheef & Stone, LLP, Roger Crabb, and Mitch Little (collectively, “Defendants”) file this Stipulation of Parties Regarding the Deadlines for Defendants’ Motion to Dismiss as follows:

1. Plaintiff filed his Original Complaint against Defendants on November 1, 2019 but did not serve Defendants with the Complaint.
2. Plaintiff filed his First Amended Complaint against Defendants on December 18, 2019. Counsel for Defendants agreed to accept service of the First Amended Complaint.
3. Defendants intend to respond to the First Amended Complaint by filing a Rule 12(b)(6) Motion to Dismiss Plaintiff's First Amended Complaint and/or other similar motion

(hereinafter “Defendants’ Motion”). Under Federal Rule of Civil Procedure 12, this motion is due within 21 days after being served with the Complaint.

4. The parties have agreed on a schedule for the briefing related to Defendants’ anticipated Rule 12(b)(6) Motion to Dismiss as follows:

- a. Defendants will file their Defendants’ Motion on or before February 28, 2020;
- b. Plaintiff will file his response to Defendants’ Motion on or before May 1, 2020;
- c. Defendants will file their Reply in Support of Defendants’ Motion on or before June 1, 2020.

Dated: December 26, 2019.

Respectfully submitted,

By /s/ Daniel D. Tostrud

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COUNSEL FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that on December 26, 2019, the above and foregoing document was forwarded to all counsel of record in accordance with the Federal Rules of Civil Procedure.

By /s/ Daniel D. Tostrud
DANIEL D. TOSTRUD